

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

**FEDERAL INSURANCE COMPANY,  
PACIFIC EMPLOYERS INSURANCE  
COMPANY, ACE AMERICAN  
INSURANCE COMPANY, ACE  
PROPERTY AND CASUALTY  
INSURANCE COMPANY, INDEMNITY  
INSURANCE COMPANY OF NORTH  
AMERICA, and WESTCHESTER FIRE  
INSURANCE COMPANY,**

**Plaintiffs,**

**v.**

**SHAW INDUSTRIES, INC.,**

**Defendant,**

**and**

**COMMERCE & INDUSTRY INSURANCE  
COMPANY; FIRST STATE INSURANCE  
COMPANY; EMPLOYERS INSURANCE  
COMPANY OF WAUSAU; GREAT  
AMERICAN INSURANCE COMPANY;  
U.S. FIRE INSURANCE COMPANY;  
TRAVELERS CASUALTY AND SURETY  
COMPANY; JOHN DOE INSURERS 1-100**

**Nominal Defendants.**

**Civil Action No: 1:23-CV-01367-RDP**

**DEFENDANT FIRST STATE INSURANCE COMPANY'S JOINDER  
IN OPPOSITION TO DEFENDANT SHAW INDUSTRIES, INC.'S  
MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(A)**

Defendant, First State Insurance Company (“First State”), respectfully submits that the Court should deny Defendant Shaw Industries, Inc.’s Motion to Transfer Venue Under 28 U.S.C. § 1404(a) for failure to meet its burden that transfer is warranted, as more fully set forth in the

Opposition to Defendant Shaw Industries, Inc.'s Motion to Transfer Venue Under 28 U.S.C. § 1404(a) (Doc. 72), which First State hereby joins.

Dated: January 19, 2024

By: /s/ Christopher C. Frost  
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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon the following via the CM/ECF system which will send electronic notification to counsel on January 19, 2024:

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